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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 15-CR-00226-BLF
)	
Plaintiff,)	JOINT STIPULATION FOR EXCLUSION OF
)	TIME FROM MAY 26, 2015, TO JUNE 9, 2015,
v.)	[PROPOSED] ORDER TO EXCLUDE TIME FROM
)	MAY 26, 2015, TO JUNE 9, 2015
DOUGLAS STROMS YORK,)	
)	
Defendant.)	
)	

JOINT STIPULATION

On May 26, 2015, the parties appeared before the Honorable Beth L. Freeman for an initial status conference. At the hearing, defense counsel informed the Court that additional time is needed for investigation to evaluate issues relating to the defendant's case. Therefore, the matter was continued until June 9, 2015 at 8:30 a.m. for further status conference.

The parties hereby stipulate that the time between May 26, 2015, and June 9, 2015, at 8:30 a.m., should be excluded from the calculation of time within which the trial in this case must commence pursuant to the Speedy Trial Act, in order to allow each counsel sufficient time to effectively prepare, taking into account the exercise of due diligence. Furthermore, the parties stipulate that the ends of

1 justice served by granting the request outweigh the best interest of the public and the defendant in a
2 speedy trial.

3 DATED: May 28, 2015

Respectfully submitted,

4 MELINDA HAAG
United States Attorney

5
6 /s/_____
BRIANNA L. PENNA
7 Special Assistant United States Attorney

8
9 DATED: May 28, 2015

10 /s/_____
GRAHAM ARCHER
Attorney for the Defendant

11 **[PROPOSED] ORDER**

12 Pursuant to the parties' motion, the Court HEREBY ORDERS that the time between May 26,
13 2015, and June 9, 2015 be excluded under the Speedy Trial Act, 18 U.S.C. § 3161. The Court finds,
14 pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), that the failure to grant the requested continuance
15 would deny counsel the reasonable time necessary for effective preparation, taking into account the
16 exercise of due diligence.

17 Furthermore, the Court finds that the ends of justice served by granting the requested
18 continuance outweigh the best interest of the public and the defendant in a speedy trial. The Court
19 therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and
20 (B)(iv).

21 IT IS SO ORDERED.

22
23
24 DATED:_____

25 _____
BETH L. FREEMAN
United States District Judge